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Attorneys for Plaintiff and Counterclaim
Defendant SHAKEY'S PIZZA ASIA
VENTURES, INC. and Third Party Defendants
CINCO CORPORATION, PC
INTERNATIONAL PTE LTD., and SPAVI
INTERNATIONAL USA, INC.

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

SHAKEY'S PIZZA ASIA VENTURES,
INC, a Philippines corporation,

Plaintiff,

v.

PCJV USA, LLC, a Delaware limited
liability company; PCI TRADING,
LLC, a Delaware limited liability
company; GUY KOREN, an individual;
POTATO CORNER LA GROUP, LLC,
a California limited liability company;
NKM CAPITAL GROUP, LLC, a
California limited liability company;
J & K AMERICANA, LLC, a California
limited liability company; J&K
LAKEWOOD, LLC, a California
limited liability company; J&K
VALLEY FAIR, LLC, a California
limited liability company; J & K
ONTARIO, LLC, a California limited
liability company; HLK MILPITAS,
LLC, a California, limited liability
company; GK CERRITOS, LLC, a
California, limited liability company;
J&K PC TRUCKS, LLC, a California

Case No. 2:24-CV-04546-SB(AGRx)

The Hon. Stanley Blumenfeld, Jr.

**REQUEST FOR JUDICIAL
NOTICE IN SUPPORT OF
PLAINTIFF'S AND THIRD
PARTY DEFENDANT'S MOTION
FOR SUMMARY JUDGEMENT**

Complaint Filed: May 31, 2024

limited liability company; and, GK CAPITAL GROUP, LLC, a California limited liability company and DOES 1 through 100, inclusive,

Defendants.

PCJV USA, LLC, a Delaware limited liability company; PCI TRADING LLC, a Delaware limited liability company; POTATO CORNER LA GROUP LLC, a California limited liability company; GK CAPITAL GROUP, LLC, a California limited liability company; NKM CAPITAL GROUP LLC, a California limited liability company; and GUY KOREN, an individual,

Counter-Claimants,

v.

SHAKEY'S PIZZA ASIA VENTURES, INC, a Philippines corporation,

Counter Defendant.

PCJV USA, LLC, a Delaware limited liability company; PCI TRADING LLC, a Delaware limited liability company; POTATO CORNER LA GROUP LLC, a California limited liability company; GK CAPITAL GROUP, LLC, a California limited liability company; NKM CAPITAL GROUP LLC, a California limited liability company; and GUY KOREN, an individual,

Third Party Plaintiffs,

v.

PC INTERNATIONAL PTE LTD., a Singapore business entity; SPAVI INTERNATIONAL USA, INC., a California corporation; CINCO CORPORATION, a Philippines corporation; and DOES 1 through 10, inclusive,

Third Party Defendants.

1 TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

2 PLEASE TAKE NOTICE that Plaintiff Shakey's Pizza Asia Ventures, Inc.
3 and Third Party Defendant Cinco Corporation respectfully requests that the Court
4 take judicial notice of the following documents pursuant to Rule 201 of the Federal
5 Rules of Evidence:

- 6 • **Trial Exhibit 001:** A true and correct copy of U.S. Patent and Trademark
7 Office Registration Certificate No. 3760041 (Potato Corner Logo Mark)
- 8 • **Trial Exhibit 002:** A true and correct copy of U.S. Patent and Trademark
9 Office Section 8 & 15 Notice of Acceptance for Reg. No. 3760041 (Potato
10 Corner Logo Mark)
- 11 • **Trial Exhibit 003:** A true and correct copy of U.S. Patent and Trademark
12 Office Registration Certificate No. 5900257 (Potato Corner Characters Mark)
- 13 • **Trial Exhibit 004:** A true and correct copy of U.S. Patent and Trademark
14 Office Trademark Assignment Cover Sheet (Potato Corner Logo Mark and
15 Characters Mark)
- 16 • **Trial Exhibit 005:** A true and correct copy of U.S. Patent and Trademark
17 Office Section 8 & 15 Notice of Acceptance for Reg. No. 6088456 (World's
18 Best Characters Mark)
- 19 • **Trial Exhibit 006:** A true and correct copy of U.S. Patent and Trademark
20 Office Trademark Assignment Cover Sheet (World's Best Characters Mark)
- 21 • **Trial Exhibit 010:** A true and correct copy of the July 13, 2018 Declaration
22 of Guy Koren filed in in the action, *Cinco Corp. v. Koren et al.*, Los Angeles
23 Superior Court, Case No. BC701075 (the "Governance Action")
- 24 • **Trial Exhibit 073:** A true and correct copy of the October 10, 2018 Verified
25 First Amended Cross-Complaint Filed by PCJV in the Governance Action.
- 26 • **Trial Exhibit 1079:** A true and correct copy of the June 28, 2019 Verified
27 Third Amended Complaint in the Corporate Governance Action.
- 28 • **Trial Exhibit 1421:** A true and correct copy of the November 12, 2019

Verified Third Amended Complaint filed in the Governance Action

Dated: September 24, 2025

FOX ROTHSCHILD LLP

/s/ Michael D. Murphy

Michael D. Murphy
Attorneys for Plaintiff and Counterclaim
Defendant SHAKEY'S PIZZA ASIA
VENTURES, INC. and Third Party
Defendants CINCO CORPORATION,
PC INTERNATIONAL PTE LTD., and
SPAVI INTERNATIONAL USA, INC.

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CERTIFICATE OF SERVICE

The undersigned certifies that, on September 24, 2025, the foregoing document was electronically filed with the Clerk of the Court for the United States District Court, Central District of California, using the Court’s ECF filing system. I further certify that all counsel for all parties to this action are registered CM/ECF user and that service will be accomplished by the CM/ECF system.

I certify under penalty of perjury that the foregoing is true and correct.

Dated: September 24, 2025

FOX ROTHSCHILD LLP

/s/ Michael D. Murphy
Michael D. Murphy
Attorneys for Plaintiff and Counterclaim
Defendant SHAKEY’S PIZZA ASIA
VENTURES, INC. and Third-Party
Defendants CINCO CORPORATION,
PC INTERNATIONAL PTE LTD., and
SPAVI INTERNATIONAL USA, INC.